

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SECURE MATRIX LLC,

Plaintiff,

v.

DAL-TILE CORPORATION,

Defendant.

Case No. 2:24-cv-01084- RWS-RSP

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**PLAINTIFF’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO ANSWER COMPLAINT**

Plaintiff Secure Matrix LLC moves unopposed for a 21-day extension of time, to and including May 9, 2025, for Defendant Dal-Tile Corporation to respond to Plaintiff’s Complaint. In support of this motion Plaintiff states that Defendant’s deadline to answer Plaintiff’s Complaint is April 18, 2025, which time has not passed.<sup>1</sup> The parties are continuing negotiations over a settlement, and Plaintiff requests additional time to for the parties to finalize a settlement that would resolve this matter.

Accordingly, Plaintiff requests that the Court grant an extension of time, to and including May 9, 2025, for Defendant to respond to Plaintiff’s Complaint. Counsel for Plaintiff has conferred with counsel for Defendant, and Defendant does not oppose the relief requested herein.

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<sup>1</sup> Plaintiff previously filed two Unopposed Applications for Extension of Time under Local Rule CV-12. Those Applications extended the time to answer by the maximum of forty-five days available under that rule. Accordingly, this request to extend the time for Defendant to answer or otherwise respond to the complaint is filed as an unopposed motion.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and extend Defendant's deadline to respond to Plaintiff's Complaint to and including May 9, 2025.

Respectfully submitted on April 18, 2025,

/s/ Isaac Rabicoff

Isaac Rabicoff

**RABICOFF LAW LLC**

4311 N Ravenswood Ave Suite 315

Chicago, IL 60613

(773) 669-4590 (telephone)

Email: [isaac@rabilaw.com](mailto:isaac@rabilaw.com)

*Counsel for Plaintiff Secure Matrix LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on April 18, 2025 via the Court's CM/ECF system.

/s/ Isaac Rabicoff  
Isaac Rabicoff

**CERTIFICATE OF CONFERENCE**

The undersigned has conferred with counsel for all parties in advance of filing this motion and the motion is unopposed.

/s/ Isaac Rabicoff  
Isaac Rabicoff

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**ORDER ON PLAINTIFF'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO ANSWER COMPLAINT**

Before the Court is the unopposed motion brought by Plaintiff Secure Matrix LLC for a 21-day extension of time, to and including May 9, 2025, for Defendant to respond to Plaintiff's Complaint. After consideration of the same, the Court finds that the motion should be GRANTED. It is, therefore,

ORDERED that Defendant shall file its answer or other response to Plaintiff's Complaint on or before May 9, 2025.